From: **Oriet Cohen-Supple** oriet@wrightandsupple.com
Subject: Re: Moorjani: Confirmation of Extension (October 18, 2021)
Date: October 21, 2021 at 9:14 AM
To: Bassirian, Zagros S. zag.bassirian@procopio.com
Cc: Turpin, Melissa Avitia Melissa.Turpin@procopio.com, Alessio, John D. john.alessio@procopio.com, Mary Wright mary@wrightandsupple.com

OC

As to a proposal, I will reach out next week via email. Stay tuned.

Oriet Cohen-Supple, Partner
Cell: 1-510-495-5749

> On Oct 21, 2021, at 9:12 AM, Bassirian, Zagros S. <zag.bassirian@procopio.com> wrote:
>
> Good Morning, Oriet –
>
> Understood. Please confirm our clients need not respond to the complaint and your client will not seek a default in the interim.
>
> On resolution, I believe you were going to make a proposal. Please do that under separate cover.
>
> Thank you.
>
> Best,
>
> **ZAG S. BASSIRIAN**
> ASSOCIATE
> PROCOPIO
>
> P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com
> 525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
> View Profile | LinkedIn | procopio.com
>
> **From:** Oriet Cohen-Supple <oriet@wrightandsupple.com>
> **Sent:** Thursday, October 21, 2021 9:10 AM
> **To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>
> **Cc:** Turpin, Melissa Avitia <Melissa.Turpin@procopio.com>; Alessio, John D. <john.alessio@procopio.com>; Mary Wright <mary@wrightandsupple.com>
> **Subject:** Re: Moorjani: Confirmation of Extension (October 18, 2021)
>
> *** EXTERNAL EMAIL - Please use Caution. ***
>
> Good morning,
>
> Our client will be amending his complaint and it will be filed and served no later than November 23, 2021.
>
> We will be happy to further discuss this matter with you to reach out a resolution if your clients are interested.
>
> Please let us know. Thanks

Please let us know. Thanks.

Oriet Cohen-Supple, Partner
Cell: 1-510-495-5749

On Oct 20, 2021, at 9:32 PM, Bassirian, Zagros S. <zag.bassirian@procopio.com> wrote:

Oriet –

Should we schedule a call for tomorrow to go over what your client intends to do with his complaint or do you intend to put that in an e-mail?

Best,

ZAG S. BASSIRIAN
ASSOCIATE
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
View Profile | LinkedIn | procopio.com

From: Oriet Cohen-Supple <oriet@wrightandsupple.com>
Sent: Tuesday, October 12, 2021 1:33 PM
To: Bassirian, Zagros S. <zag.bassirian@procopio.com>
Cc: Turpin, Melissa Avitia <Melissa.Turpin@procopio.com>; Alessio, John D. <john.alessio@procopio.com>
Subject: RE: Moorjani: Confirmation of Extension (October 18, 2021)

*** EXTERNAL EMAIL - Please use Caution. ***

Nice speaking with you as well. Confirmed.

From: Bassirian, Zagros S. <zag.bassirian@procopio.com>
Sent: Monday, October 11, 2021 3:31 PM
To: Oriet Cohen-Supple <oriet@wrightandsupple.com>
Cc: Turpin, Melissa Avitia <Melissa.Turpin@procopio.com>; Alessio, John D. <john.alessio@procopio.com>
Subject: RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

Nice speaking with you. Our clients agreed with your proposal to extend our response deadline to November 1, 2021 so that you have more time to get familiar with the merits of the case. On our call you said you would let me know by October 21st whether your client will dismiss or amend. Please confirm.

Thank you.

Best,

ZAG S. BASSIRIAN
ASSOCIATE
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
View Profile | LinkedIn | procopio.com

From: Oriet Cohen-Supple <oriet@wrightandsupple.com>
Sent: Friday, October 8, 2021 2:26 PM
To: Bassirian, Zagros S. <zag.bassirian@procopio.com>
Subject: Re: Moorjani: Confirmation of Extension (October 18, 2021)

*** EXTERNAL EMAIL - Please use Caution. ***

Apologies… can have a call today at 5:00 or Monday after 2:30. Let me k is and I will send a calendar invite.

Oriet Cohen-Supple, Partner
Cell: 1-510-495-5749

> On Oct 8, 2021, at 2:24 PM, Bassirian, Zagros S. <zag.bassirian@procopio.com> wrote:
>
> Hi Oriet –
>
> Following up on this. Thank you.
>
> Best,
>
> **ZAG S. BASSIRIAN**
> ASSOCIATE
> PROCOPIO
>
> P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com
> 525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
> View Profile | LinkedIn | procopio.com

From: Oriet Cohen-Supple <oriet@wrightandsupple.com>
Sent: Monday, October 4, 2021 9:32 PM
To: Bassirian, Zagros S. <zag.bassirian@procopio.com>
Subject: RE: Moorjani: Confirmation of Extension (October 18, 2021)

*** EXTERNAL EMAIL - Please use Caution. ***

Hello Zag,

Nice to e-meet you too,

I am and will reach out in the next 48 hours to set up a call to further discuss.

Warm Regards,
Oriet Cohen-Supple
Partner

<image001.jpg>

Wright & Supple LLP
660 Key Route Blvd. | Albany, California 94706-1423
(510) 495-5749 (direct)
oriet@wrightandsupple.com | www.wrightandsupple.com

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Bassirian, Zagros S. <zag.bassirian@procopio.com>
Sent: Monday, October 4, 2021 9:30 PM
To: Oriet Cohen-Supple <oriet@wrightandsupple.com>
Subject: FW: Moorjani: Confirmation of Extension (October 18, 2021)

Hi Oriet –

Nice to meet you via e-mail. I wanted to reach out and introduce myself, as well as confirm that you are representing Deepak Moorjani. I am attaching our meet and confer letter regarding our clients' intended demurrer.

Are you able to let me know by Friday whether your client

intends to dismiss?

Thank you.

Best,

ZAG S. BASSIRIAN
ASSOCIATE

P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
View Profile | LinkedIn | procopio.com

<image002.jpg>

-----Original Message-----
Sent: Friday, October 1, 2021 7:46 AM
To: Bassirian, Zagros S. <zag.bassirian@procopio.com>
Subject: Moorjani: Confirmation of Extension (October 18, 2021)

* EXTERNAL EMAIL - Please use Caution. *

Hi Zagros,

I am providing legal counsel's contact info below. She will contact you once she has reviewed the file.

Oriet Cohen-Supple
Wright & Supple LLP
660 Key Route Blvd
Albany, CA 94706-1423
510-495-5749
oriet@wrightandsupple.com

Confidentiality Notice:
This e-mail message, including any attachments, is for the sole use of the intended recipient(s).
Any unauthorized review, use, disclosure or distribution of this information is prohibited.
If this was received in error, please (i) notify the sender by email

and (ii) destroy all copies of the original message.

> -------Original Message-------
> From: Bassirian, Zagros S. <zag.bassirian@procopio.com>
> Subject: RE: Moorjani - Confirmation of Extension
> Sent: 2021-09-30 8:32am
>
> Hi Mr. Moorjani -
>
> Thank you for the extension until October 18, 2021 and confirming you
> have engaged counsel. Please let me know their contact information so
> I can update our records and be on the look out for their call.
>
> Have a great weekend.
>
> Best,
>
> ZAG S. BASSIRIAN
> ASSOCIATE
> ▬
> P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com
> 525 B STREET, SUITE 2200, SAN DIEGO, CA 92101 VIEW PROFILE |
> LINKEDIN | PROCOPIO.COM
>
> -----Original Message-----
> Sent: Thursday, September 30, 2021 6:25 AM
> To: Bassirian, Zagros S. <zag.bassirian@procopio.com>
> Subject: Re: Moorjani - Confirmation of Extension
>
> * EXTERNAL EMAIL - Please use Caution. *
>

> Confidentiality Notice:
>
> This e-mail message, including any attachments, is for the sole use
> of the intended recipient(s).
>
> Any unauthorized review, use, disclosure or distribution of this
> information is prohibited.
>
> If this was received in error, please (i) notify the sender by email
> and (ii) destroy all copies of the original message.
>
> > -------Original Message-------
>
> > From: Bassirian, Zagros S. <zag.bassirian@procopio.com>
>
>
>
> > Subject: Re: Moorjani - Confirmation of Extension
>
> > Sent: 2021-09-24 5:27am
>
> >
>
> > Thank you and you too.
>
> >
>
> > Best,
>
> >
>
> > ZAG S. BASSIRIAN

>
> > ASSOCIATE
>
> > ▬
>
> > P. 619.906.5759 | F. 619.744.5478 |
zag.bassirian@procopio.com
>
> > 525 B STREET, SUITE 2200, SAN DIEGO, CA 92101
>
> >
>
> > On Sep 24, 2021 6:24 AM, Deepak Moorjani

> >
>
> > Confidentiality Notice:
>
> > This e-mail message, including any attachments, is for the
sole use
> of the intended recipient(s).
>
> > Any unauthorized review, use, disclosure or distribution of
this
> information is prohibited.
>
> > If this was received in error, please (i) notify the sender by
> email and (ii) destroy all copies of the original message.
>
> >
>

> >
>
> > -------Original Message-------
>
> > From: Bassirian, Zagros S.
<zag.bassirian@procopio.com> > To:
>
[redacted]
Cc: Turpin,
>
> > Melissa Avitia <Melissa.Turpin@procopio.com> > Subject:
Moorjani -
>
> > Confirmation of Extension > Sent: 2021-09-23 4:03pm > >
Mr.
>
> > Moorjani – > > It was nice speaking with you yesterday.
This will
>
> > confirm you agreed > to a global response deadline of
10/11/21 for
>
> > our clients. We also > scheduled a call for 10:30 a.m. on
10/1/21
> to
>
>
> > discuss whether you > intend to proceed or dismiss the
Complaint.
> If
>
>
> > any of this is > incorrect please let me know.
>
> > >
>
> > > Thank you.
>
> > >
>
> > > Best,
>
> > >
>
> > > ZAG S. BASSIRIAN
>
> > > ASSOCIATE
>
> > > ▬
>

> > > P. 619.906.5759 | F. 619.744.5478 |
zag.bassirian@procopio.com >
>
> > 525 B STREET, SUITE 2200, SAN DIEGO, CA 92101 >
VIEW PROFILE |
>
> > LINKEDIN | PROCOPIO.COM > > Thu Sep 23 2021
17:03:27
>
> >
>
> > Fri Sep 24 2021 06:26:54
>
> >
>
> > This is an email from Procopio, Cory, Hargreaves &
Savitch LLP,
> Attorneys at Law. This email and any attachments hereto may
contain
> information that is confidential and/or protected by the
> attorney-client privilege and attorney work product doctrine.
This
> email is not intended for transmission to, or receipt by, any
> unauthorized persons. Inadvertent disclosure of the contents
of this
> email or its attachments to unintended recipients is not
intended to
> and does not constitute a waiver of attorney-client privilege
or
> attorney work product protections. If you have received this
email in
> error, immediately notify the sender of the erroneous receipt
and
> destroy this email, any attachments, and all copies of same,
either
> electronic or printed. Any disclosure, copying, distribution, or
use
> of the contents or information received in error is strictly
> prohibited.
>
> >
>
> Thu Sep 30 2021 09:32:28
>
> This is an email from Procopio, Cory, Hargreaves & Savitch
LLP,
> Attorneys at Law. This email and any attachments hereto may
contain
> information that is confidential and/or protected by the
> attorney-client privilege and attorney work product doctrine.

This
> email is not intended for transmission to, or receipt by, any
> unauthorized persons. Inadvertent disclosure of the contents of this
> email or its attachments to unintended recipients is not intended to
> and does not constitute a waiver of attorney-client privilege or
> attorney work product protections. If you have received this email in
> error, immediately notify the sender of the erroneous receipt and
> destroy this email, any attachments, and all copies of same, either
> electronic or printed. Any disclosure, copying, distribution, or use
> of the contents or information received in error is strictly
> prohibited.
>

Mon Oct 04 2021 21:29:52

This is an email from Procopio, Cory, Hargreaves & Savitch LLP, Attorneys at Law. This email and any attachments hereto may contain information that is confidential and/or protected by the attorney-client privilege and attorney work product doctrine. This email is not intended for transmission to, or receipt by, any unauthorized persons. Inadvertent disclosure of the contents of this email or its attachments to unintended recipients is not intended to and does not constitute a waiver of attorney-client privilege or attorney work product protections. If you have received this email in error, immediately notify the sender of the erroneous receipt and destroy this email, any attachments, and all copies of same, either electronic or printed. Any disclosure, copying, distribution, or use of the contents or information received in error is strictly prohibited.

Fri Oct 08 2021 14:23:58

This is an email from Procopio, Cory, Hargreaves & Savitch LLP, Attorneys at Law. This email and any attachments hereto may contain information that is confidential and/or protected by the attorney-client privilege and attorney work product doctrine. This email is not intended for transmission to, or receipt by, any unauthorized persons. Inadvertent disclosure of the contents of this email or its attachments to unintended recipients is not intended to and does not constitute a waiver of attorney-client privilege or attorney work product protections. If you have received this email in error, immediately notify the sender of the erroneous receipt and destroy this email, any attachments, and all copies of same, either electronic or printed. Any disclosure, copying, distribution, or use of the contents or information received in error is strictly prohibited.

Mon Oct 11 2021 15:31:28

This is an email from Procopio, Cory, Hargreaves & Savitch LLP, Attorneys at Law. This email and any attachments hereto may contain information that is confidential and/or protected by the attorney-client privilege and attorney work product doctrine. This email is not intended for transmission to, or receipt by, any unauthorized persons. Inadvertent disclosure of the contents of this email or its attachments to unintended recipients is not intended to and does not constitute a waiver of attorney-client privilege or attorney work product protections. If you have received this email in error, immediately notify the sender of the erroneous receipt and destroy this email, any attachments, and all copies of same, either electronic or printed. Any disclosure, copying, distribution, or use of the contents or information received in error is strictly prohibited.

Wed Oct 20 2021 21:32:33

This is an email from Procopio, Cory, Hargreaves & Savitch LLP, Attorneys at Law. This email and any attachments hereto may contain information that is confidential and/or protected by the attorney-client privilege and attorney work product doctrine. This email is not intended for transmission to, or receipt by, any unauthorized persons. Inadvertent disclosure of the contents of this email or its attachments to unintended recipients is not intended to and does not constitute a waiver of attorney-client privilege or attorney work product protections. If you have received this email in error, immediately notify the sender of the erroneous receipt and destroy this email, any attachments, and all copies of same, either electronic or printed. Any disclosure, copying, distribution, or use of the contents or information received in error is strictly prohibited.

Thu Oct 21 2021 09:12:40

This is an email from Procopio, Cory, Hargreaves & Savitch LLP, Attorneys at Law. This email and any attachments hereto may contain information that is confidential and/or protected by the attorney-client privilege and attorney work product doctrine. This email is not intended for transmission to, or receipt by, any unauthorized persons. Inadvertent disclosure of the contents of this email or its attachments to unintended recipients is not intended to and does not constitute a waiver of attorney-client privilege or attorney work product protections. If you have received this email in error, immediately notify the sender of the erroneous receipt and destroy this email, any attachments, and all copies of same, either electronic or printed. Any disclosure, copying, distribution, or use of the contents or information received in error is strictly prohibited.